

UNITED STATES DISTRICT COURT

for the

Western District of New York

Black Love Resists in the Rust, et al.

Plaintiff

v.

City of Buffalo, et al.

Defendant

Civil Action No. 1:18-cv-00719-CCR

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To:

New York State Department of Motor Vehicles

Room 136, Swan Street Building

Empire State Plaza, Albany, NY 12228

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

Place: Wester New York Law Center 37 Franklin Street, 2nd Floor Buffalo, NY 14202	Date and Time: [tbd]
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☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
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The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: _____

CLERK OF COURT

OR

s/Edward P. Krugman

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* Plaintiffs
_____, who issues or requests this subpoena, are:
Edward P. Krugman, National Center for Law and Economic Justice, 50 Broadway, Ste. 1500, New York, NY 10004-3821
646-680-8912. krugman@nclej.org

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. **1:18-cv-00719-CCR**

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ **0.00** .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

**SCHEDULE A TO SUBPOENA TO
NEW YORK STATE DEPARTMENT OF MOTOR VEHICLES
REGARDING DRIVER'S LICENSE ADDRESS INFORMATION
Black Love Resists in the Rust v. City of Buffalo
No. 1:18-cv-00719**

This subpoena requires production of the electronically stored information described below in the possession, custody, or control of the New York State Department of Motor Vehicles ("DMV"). Production is to be made, at the election of the producing party, either (a) on removable media, such as a U.S.B. key or a DVD-ROM or (b) by upload to a secure file transfer site (details will be supplied on request).

The attached Schedule A-1 contains a list of New York State Driver's License numbers, each of which relates to one or more traffic tickets issued by the Buffalo Police Department. For each driver's license identified, please produce the driver's "address history" from January 1, 2020 to the present (the "Time Period"). That is, for each license number, please produce each address (including street address, city, state, and zipcode) shown as associated with that license number at any point in the Time Period, together with the date range for which the association is shown.

Please note that production of the driver's name is ***not*** requested.

Production shall be made in electronic form, preferably in an Excel spreadsheet in the format set forth in Schedule A-2. Schedule A-2 assumes that, for drivers with multiple addresses during the Time Period, there will be a separate row of the spreadsheet for each address. Plaintiffs are prepared to discuss form of production if needed. Schedule A-1 will also be made available in electronic form to assist in production.

**SCHEDULE A-1 TO SUBPOENA TO
NEW YORK DEPARTMENT OF MOTOR VEHICLES
*BLRR v. CITY OF BUFFALO, 18-cv-719 (W.D.N.Y.)***

031844945	103801193	108440004	114866930	119402813
061496567	103962959	108782311	114947502	119497753
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100035657	104120890	109337649	115019400	119623649
100123923	104297605	109351140	115025863	119836727
100328248	104391671	109354697	115188990	119927071
100362983	104395495	109365610	115474363	119954787
100436241	104601193	109843076	115549716	120008404
100564945	104647410	109967602	115579278	120118766
100647711	104707935	110263659	115792088	120184753
100883212	104756168	110672458	115898806	120282957
100939970	104808911	110690292	116123019	120309212
101010221	104883727	111023104	116191509	120397178
101191271	105112091	111173909	116256385	120586987
101244224	105329682	111471923	116402403	120689454
101301826	105497439	111487661	116413701	120725521
101311297	105554732	111575315	116474963	120741044
101456188	105560547	111576711	116505657	120774883
101546220	105907020	111587227	116546637	120951261
101562107	105918201	111639381	116574036	121017847
101766090	105933251	111795044	116743833	121057861
101796435	105962850	111838145	116786782	121149145
102105664	106059186	111952329	117226447	121236900
102248595	106108030	112078424	117296301	121257588
102286157	106250223	112088132	117333214	121336059
102287668	106484202	112392569	117457307	121414772
102288363	106487149	112495282	117515006	121482121
102338687	106732415	112520178	117517585	121562828
102413786	106743244	112522293	117818549	121907080
102467957	106977986	112634137	117909609	122089787
102561090	106986250	112667732	117959721	122336946
102564248	107162105	113270115	118268502	122444262
102694976	107272780	113435882	118269544	122455479
102945313	107331964	113659426	118595151	122455663
103018203	107422672	113691840	118651448	122493691
103082228	107635542	113965887	118665346	122603026
103314786	107669115	114308275	118721645	122889008
103595897	107751748	114655953	118731250	123016550
103626218	107756114	114663235	118899260	123186240
103629088	108047175	114748360	119121794	123445858
103662793	108076056	114818270	119136995	123456789
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124067032	128953710	134504306	138445182	143155687
124087745	129280945	134626013	138460792	143171265
124152710	129288909	134739547	138574373	143185149
124231889	129436881	134910397	138579402	143218221
124523581	129486886	134924051	138963043	143296261
124560187	129569262	134952096	139010068	143384458
124632813	129572037	135027611	139136874	143739172
125017120	129606072	135218894	139305243	143748414
125200246	129663111	135372597	139374579	143749414
125255772	129669787	135444417	139412931	143832807
125259247	130041693	135586007	139425938	143964129
125475140	130205093	135626948	139696381	143968955
125975592	130238856	135640023	139993820	143977530
126151289	130393723	135672337	140064820	143997750
126170986	130537331	135755335	140251007	144214679
126257174	130704570	135798650	140263799	144388602
126376762	130795531	135830070	140357928	144503927
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126682795	131854200	136192080	140889701	144878334
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126968321	131932272	136219058	140929939	145113968
127041096	132371389	136241491	140970433	145160454
127294071	132487774	136392575	140977493	145346321
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127711055	133249916	136780332	141482206	145923222
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128227111	134015721	137424796	142285131	146697485
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147870352	152457359	157274903	161562715	167419855
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147880577	152626297	157671187	161681731	167798536
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148253647	153090646	157859088	161841173	168307248
148346999	153226752	157861835	161988634	168402232
148455738	153379808	157866433	162012542	168509286
148478845	153505574	157926300	162151996	168614794
148518114	153545524	158045378	162201117	168695437
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150518068	155654537	160480989	164902117	170104681
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172282994	176622269	181464763	186099960	189961949
172353119	176676002	181511279	186132437	190118016
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173519612	177706445	182547696	187412671	190907895
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174662332	178850860	183278039	188255427	192080861
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175644514	179957543	184237336	188890887	192632195
175645269	179965631	184270144	188959748	192664796
175657573	180007147	184417429	189045020	192763815
175664693	180055962	184535714	189068474	192769364
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193468974	198032658	201767957	206714601	209991282
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193832852	198130773	202286577	206823232	210087279
193848942	198130905	202535643	206825620	210387734
193969318	198229172	202655534	206898419	210498454
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194137905	198437327	202876580	206941979	210600801
194171901	198444772	203161858	206982040	210609223
194680160	198482994	203265862	207037639	210805023
194917757	198554541	203338437	207061276	210829782
194985572	198565019	203352122	207098499	210867186
194986746	198638543	203398645	207135120	211124419
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195150363	199191054	203912879	207242583	211657777
195265493	199310301	204063723	207251455	211902988
195279573	199398705	204202848	207538906	211988126
195397997	199517686	204204767	207652180	212091315
195663499	199626786	204411401	207709256	212098741
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195720962	199827952	204589337	207895366	212306540
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**SCHEDULE A-2 TO SUBPOENA TO
NEW YORK STATE DEPARTMENT OF MOTOR VEHICLES
REGARDING DRIVER'S LICENSE ADDRESS INFORMATION
Black Love Resists in the Rust v. City of Buffalo
No. 1:18-cv-00719**

This Schedule A-2 sets forth the form of production (rows and columns) for the address information requested in this subpoena. Production should be made in an Excel spreadsheet if possible, but a .csv or other flat file is acceptable if need be.

<u>License Number</u>	<u>Street Address</u>	<u>City</u>	<u>State</u>	<u>Zip</u>	<u>Begin Date</u>	<u>End Date</u>
0123456789	123 West 4th Street	Buffalo	NY	14201	1/1/2020	3/25/2021
0123456789	456 West 8th Street	Buffalo	NY	14205	3/26/2021	12/31/2021
5678901234	789 West 12th Street	Buffalo	NY	14215	1/1/2020	12/31/2021
9876543210	222 East 19th Street	Buffalo	NY	14218	4/15/2020	12/31/2021
etc.						